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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and  
DOES NOS. 1-50,

Defendants.

SKYRYSE, INC.,

Counterclaimant,

v

MOOG INC.,

Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-MAR

**STIPULATION AND JOINT  
REQUEST TO MODIFY  
PROTECTIVE ORDER**

Complaint Filed: March 7, 2022  
Counterclaims Filed: January 30, 2023

Judge: Hon. Margo A. Rocconi  
Crtrm: 790, 7th Floor

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*Attorneys for Defendant Misook Kim*

**STIPULATION**

IT IS HEREBY STIPULATED by and between Plaintiff and Counterclaim-  
Defendant Moog Inc. (“Moog”), Defendant and Counterclaimant Skyryse, Inc.  
 (“Skyryse”), Defendant Robert Alin Pilkington (“Pilkington”), and Defendant  
 Misook Kim (“Kim”) (Kim and Pilkington are collectively referred to as the  
 “Individual Defendants”) (collectively, the “Parties”) through their respective  
 attorneys of record, as follows:

WHEREAS, Jeri Rouse Looney is no longer employed by Skyryse.

WHEREAS, Blake Bilstad is the current General Counsel of Skyryse.

WHEREAS, the Parties stipulate and agree to amend Paragraph 1.5 of the  
 Protective Order (Dkt. 89) to remove the reference to Ms. Looney and replace it with  
 a reference to Mr. Bilstad, so the amended paragraph will read as follows:

“1.5 Designated In-House Counsel means In-House Counsel who seek  
 access to “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”  
 information in this action. Unless otherwise agreed to by the Parties, Designated In-  
 House Counsel means Jeffrey T. Williams, counsel for Moog Inc. and Blake Bilstad,  
 counsel for Skyryse, Inc.”

NOW, THEREFORE, the Parties stipulate and agree, subject to the Court’s  
 approval, to so modify the Protective Order.

**IT IS SO STIPULATED.**

Dated: May 10, 2023

**SHEPPARD, MULLIN,  
 RICHTER & HAMPTON LLP**

By: /s/ Kazim A. Naqvi  
 Counsel for Plaintiff and Counter-  
 Defendant Moog Inc.

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By: /s/ Gabriel S. Gross  
Counsel for Defendant and  
Counterclaimant Skyrise, Inc.

**ZWEIBACK Fiset &  
ZALDUENDO LLP**

By: /s/ Scott D. Tenley  
Counsel for Defendant Robert Alin  
Pilkington

**HALPERN MAY YBARRA &  
GELBERG LLP**

By: /s/ Grant B. Gelberg  
Counsel for Defendant Misook Kim

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**ATTESTATION**

Pursuant to Civil Local Rule 5-4.3.4, I, Gabriel S. Gross, attest that  
concurrence in the filing of this document has been obtained by all signatories.

Dated: May 10, 2023 /s/ Gabriel S. Gross